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Attorney for Defendant
JESUS VASQUEZ

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,

v.

JESUS LOUIS VASQUEZ,
Defendant

CASE NO. 2:23-cr-00095-JAM-1

**ELEVENTH STIPULATION AND ORDER
TO CONTINUE AND EXCLUDE TIME**

Date: December 9, 2025
Time: 9:00 a.m.
Court: Hon. John A. Mendez

STIPULATION

Plaintiff United States of America, by and through its counsel of record, Special Assistant
United States Attorney Caily Nelson, and defendant, by and through its counsel of record,
Mark J. Reichel, hereby stipulate as follows:

STIPULATION AND ORDER

1. By stipulation, the defendant moves to continue the status conference to December 9, 2025, at 9:00 a.m., and to exclude time between October 1, 2025 and December 9, 2025, with an exclusion of time, under Local Code T4.
2. The parties agree and stipulate, and request that the Court find the following:
 - a. The discovery associated with this case includes over one hundred pages of reports, photos, and search warrant documents, as well as cellular phone downloads. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.
 - b. Counsel for defendant desires additional time to review the discovery with his client, research and investigate possible defenses, discuss any potential resolution with his client, research mitigating evidence, and present it to the prosecution.
 - c. Counsel for defendant believes that failure to grant the above requested continuance would deny him/her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
 - d. The government does not object to the continuance.
 - e. Based on the above stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.
 - f. For the purpose of computing time un the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of October 1, 2025 to December 9, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at

defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

3. Nothing in the stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate the additional time periods are excludable from the period within which a trial must commence.

Dated: October 1, 2025

ERIC GRANT
Acting United States Attorney

/s/ CAILY NELSON
CAILY NELSON
Special Assistant United States
Attorney

Dated: October 1, 2025

/s/ MARK REICHEL
MARK REICHEL
Counsel for Defendant
JESUS VASQUEZ

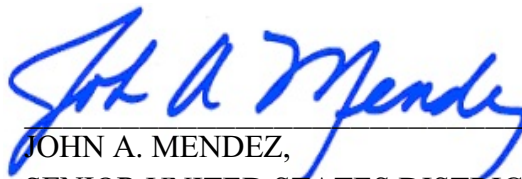
ORDER

The October 07, 2025 **Further Status Conference/Possible Change of Plea Hearing** is **VACATED** and **RESET** for **December 09, 2025, at 09:00 a.m.**

The Court finds that based on the facts set forth in the parties' stipulation, the failure to exclude the time would deny counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court further finds that the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. Time from October 1, 2025, to and including December 9, 2025, is excluded from the computation of time within which the trial of this case must commence under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv), and Local Code T-4. With this stipulation, 0 of 63 days have been used against the computation of time within which a trial must commence.

IT IS SO ORDERED.

October 02, 2025



JOHN A. MENDEZ,
SENIOR UNITED STATES DISTRICT JUDGE